

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

9384-2557 QUÉBEC INC., a Canadian corporation;
MINEDMAP, INC., a Nevada corporation; and SERENITY
ALPHA, LLC, a Nevada limited liability, and other similarly
situated individuals,

Plaintiffs,

-against-

NORTHWAY MINING, LLC, a New York limited liability
company; MICHAEL MARANDA, an individual; MICHAEL
CARTER, an individual; CSX4236 MOTORCYCLE
SALVAGE, LLC, a New York limited liability company;
DROR SVORAI, an individual; MINING POWER GROUP,
INC., a Florida corporation; HUDSON DATA CENTER, INC,
a New York Corporation, MICHAEL MARANDA, LLC, a
New York Limited liability company; PORTER KING HILL
CONTRACTING, LLC, COINMINT, LLC, a Delaware limited
liability company,

Defendants.

STATE OF NEW YORK)
)s.s.:
COUNTY OF)

**AFFIDAVIT OF MICHAEL
CARTER**

**In Opposition to Motion for Fees
and Costs**

Civ. Action No.: 1:19-CV-00501-
TJM-CFH

MICHAEL CARTER, being duly sworn deposes and says under penalty of perjury the
following:

1. I am one of the defendants in the above-captioned case. I understand that the
plaintiffs have filed a motion for fees and costs against me, defendant Michael Maranda and non-
party Melissa Welsh. I submit this affidavit in opposition to that motion. This affidavit is based
upon my personal knowledge.

2. I am not an owner, manager or officer of any of the corporate or LLC defendants,
But I do know defendant Michael Maranda, and I have provided him with technical support from
time to time in connection with setting up and running some of his bitcoin mining facilities. I have

a technical, electrical background. I helped fit up the locations at 193 East Seneca Street, and 2140 County Route 1, Oswego, New York for electrical power and hosting capability in late 2019 and early 2020.

3. The plaintiffs' motion apparently complains about certain events in 2019, and other events in 2020. I will briefly address both.

A. The Plaintiffs' Motion Concerning 2019

4. The part of the plaintiffs' motion concerning 2019 appears to be about the fact that defendant Michael Maranda did not agree to return the Serenity/Minedmap machines in 2019, which caused Serenity/Minedmap to file this case in April 2019 and, apparently, to try to seize their mining devices at Northway Mining's facility in Cossackie, New York.

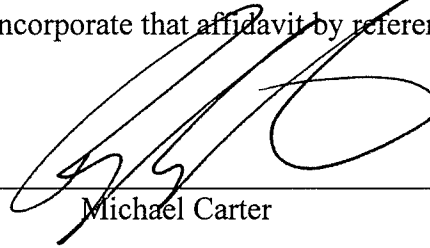
5. Michael Maranda explains in his affidavit that in February 2019 the Serenity/Minedmap machines were moved to a different facility in Massena, New York, because Serenity/Minedmap apparently decided that it did not want to pay the energy rate that Northway Mining charged in Cossackie.

6. I know that Serenity/Minedmap was aware, in February 2019, that their machines were at Coinmint in Massena. I know that because in February 2019, Daniel Kim from Serenity/Minedmap called me on my phone. I don't know how he got my number, or how he knew I worked for Maranda from time-to-time, but during that phone call he indicated that he had lost trust in Maranda and asked me questions about Maranda. During that phone call, Kim mentioned that the Serenity/Minedmap machines were at Coinmint.

B. The Plaintiffs' Motion Concerning 2020

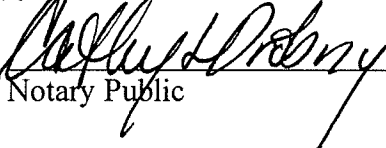
7. The plaintiffs recently filed a motion for contempt sanctions against me arising out of the same alleged events in 2020 that are the subject of this motion for fees and costs. In

opposition to the contempt motion, I signed an affidavit of August 12, 2020, a true and accurate copy of which is annexed hereto as Exhibit A. I incorporate that affidavit by reference.



Michael Carter

Sworn to before me this
19th day of August, 2020



Notary Public

CATHY L. DROBNY
Notary Public, State of New York
No. 01DR5051077
Qualified in Saratoga County
Commission Expires 10/23/24